

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,)	
)	
v.)	Criminal No. 1:18-cr-00083-TSE
)	
PAUL J. MANAFORT, JR.,)	Judge T. S. Ellis, III
)	
Defendant.)	

PAUL J. MANAFORT, JR.'S REQUEST FOR JUDICIAL NOTICE

Paul J. Manafort, Jr., by and through counsel, requests pursuant to Rule 201 of the Federal Rules of Evidence that the Court take judicial notice of certain facts. During redirect examination of James Brennan the government elicited information regarding the non-performance of the loans made by The Federal Savings Bank ("TFSB") to Mr. Manafort. In response, on re-cross, counsel asked Mr. Brennan whether the loans were written off by TFSB after the government indicted Mr. Manafort and sought forfeiture of underlying collateral. The witness did not know. Defendant now asks the Court to take judicial notice of the following facts based upon the indictment in the matter pending in the U.S. District Court for the District of Columbia (Doc. 13, at pg. 30):

On October 27, 2017, the Office of Special Counsel brought an indictment against Paul Manafort charging him with various offenses and seeking forfeiture of the property known as 377 Union Street, Brooklyn, New York and the property known as the Bridgehampton property located at 174 Jobs Lane, Water Mill, New York.

Dated: August 13, 2018

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of July 2018, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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